

Exhibit 1

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

JESSE HAMMONS,)	
)	
Plaintiff,)	
v.)	Case No. 1:20-cv-02088-DKC
)	
UNIVERSITY OF MARYLAND MEDICAL SYSTEM)	
CORPORATION, et al.)	
)	
Defendants.)	
)	

DECLARATION OF DENISE GIRAUDO

I, Denise Giraudo, declare under penalty of perjury:

1. I am an attorney at the law firm Sheppard, Mullin, Richter & Hampton LLP, counsel for Defendants University of Maryland Medical System Corporation, UMSJ Health System, LLC, and University of Maryland St. Joseph Medical Center, LLC (“Defendants”), in the above captioned action, and I am admitted to practice in this Court. I submit this declaration in support of Defendants’ Memorandum in Opposition to Plaintiff’s Cross-Motion for Summary Judgment and Reply in Further Support of Defendants’ Motion for Summary Judgment (“Defendants’ Opposition”). I have personal knowledge of the facts herein and am competent to testify to them as necessary.

2. Exhibit 2 to Defendants’ Opposition is a true and correct excerpt of the certified transcript of the deposition of Dr. Gail Cunningham, both in her personal capacity and under Rule 30(b)(6), taken on April 14, 2022.

3. Exhibit 3 to Defendants’ Opposition is a true and correct excerpt of the certified transcript of the Rule 30(b)(6) deposition of William C. Greskovich, taken on May 20, 2022.

4. Exhibit 4 to Defendants' Opposition is a true and correct excerpt of the certified transcript of the deposition of Fr. Louis Asobi, taken on April 11, 2022.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief. I further reserve the right to supplement and/or amend this Declaration.



Dated: August 15, 2022

Denise Giraudo (Bar No. 29015)
Paul Werner (admitted *pro hac vice*)
Danielle Vrabie (admitted *pro hac vice*)
Imad Matini (admitted *pro hac vice*)
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CERTIFICATE OF SERVICE

I hereby certify that on August 15, 2022, Plaintiff's counsel was served with the foregoing document through the Court's Electronic Case Filing System.

/s/ Denise Giraudo

Denise Giraudo